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4 (206) 623-7580

Honorable Christopher M. Alston  
Chapter 11  
Hearing Location: Seattle Rm 7206  
Hearing Date: Friday November 22, 2019  
Hearing Time: 9:30 a.m.  
Response Date: November 15, 2019

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8 UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 In re:  
10 NORTHWEST TERRITORIAL MINT, LLC,  
11 Debtor.

Case No. 16-11767-CMA

REPLY IN SUPPORT OF TRUSTEE  
COUNSEL'S MOTION TO ALTER AND  
AMEND FINDINGS OF FACT AND  
CONCLUSIONS OF LAW IN ORDER ON  
FEE APPLICATIONS

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14 **I. REPLY**

15 K&L Gates LLP ("K&L Gates" or "Trustee Counsel"), counsel for the Chapter 11 Trustee  
16 for Northwest Territorial Mint, LLC (the "Trustee"), files this Reply in support of its Motion to Alter  
17 and Amend Findings of Fact and Conclusions of Law in Order on Fee Application (Dkt. No. 2141)  
18 ("Motion to Alter and Amend"). No objections have been filed to the Motion to Alter and Amend.<sup>1</sup>

19 Trustee Counsel is prepared to appear at the hearing Friday, November 22, 2019. The Trustee  
20 filed a joinder to the Motion to Alter and Amend. The Trustee has separate counsel, Paul Fogarty,  
21 who is prepared to specially appear for purposes of the Trustee's joinder, solely in the Trustee's  
22 capacity as an applicant for compensation.<sup>2</sup> While Trustee Counsel and Mr. Fogarty are prepared to  
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24 <sup>1</sup> On November 7, 2019, William Hanson filed a letter with the Court that references "Mr. Gearin's motion to reconsider  
25 the court's decision on fee distribution." However, that letter does contain any substantive response to the Motion to  
Alter and Amend and does not object to the relief requested.

26 <sup>2</sup> The Trustee is out of the country on a previously scheduled trip and is unable to attend the hearing.

TRUSTEE COUNSEL'S REPLY IN SUPPORT OF  
MOTION TO ALTER AND AMEND FINDINGS OF  
FACT AND CONCLUSIONS OF LAW IN ORDER ON  
FEE APPLICATIONS- 1

502637113 v3

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1 attend the hearing, in light of the fact that there are no objections to the Motion to Alter and Amend,  
2 Trustee Counsel and the Trustee are prepared to rest on the pleadings if the Court determines that no  
3 hearing is necessary.

4 DATED this 19th day of November, 2019.

5  
6 K&L GATES LLP

7 By /s/Michael J. Gearin

8 Michael J. Gearin, WSBA #20982

9 David C. Neu, WSBA #33143

10 Brian T. Peterson, WSBA #42088

11 Attorneys for Mark Calvert, Chapter 11 Trustee  
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TRUSTEE COUNSEL'S REPLY IN SUPPORT OF  
MOTION TO ALTER AND AMEND FINDINGS OF  
FACT AND CONCLUSIONS OF LAW IN ORDER ON  
FEE APPLICATIONS- 2

502637113 v3

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That she is a paralegal in the law firm of K&L Gates LLP, and on November 19, 2019, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

Executed on the 19th day of November, 2019 at Seattle, Washington.

TRUSTEE COUNSEL'S REPLY IN SUPPORT OF  
MOTION TO ALTER AND AMEND FINDINGS OF  
FACT AND CONCLUSIONS OF LAW IN ORDER ON  
FEE APPLICATIONS- 3

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